



ANIMAL WELFARE INSTITUTE

P.O. Box 3650, Washington, D.C. 20027-0150 www.awionline.org

telephone: (703) 836-4300 facsimile: (703) 836-0400

June 12, 2006

Mark A. Bradley, Associate Deputy Administrator
Transportation and Marketing Programs
National Organic Program
1400 Independence Ave., SW
Room 4008-So., Ag Stop 0268
Washington, D.C. 20250

RE: Docket Number TM-05-14

Dear Mr. Bradley:

On behalf of the Animal Welfare Institute (AWI), a non-profit educational organization advocating humane treatment of animals since 1951, and our members, I thank you for the opportunity to comment on the relationship between ruminant (particularly dairy) animals and pasture.

Based on our experience, discussions with producers countrywide and understanding of consumers' expectations, AWI strongly recommends that organic dairy products only come from animals who live on pasture at least 180 days of the year, with the vast majority of their daily nutrition coming from grazing on quality pasture.

Rather than stipulate that animals "have access to" the outdoors, it should be required for organic production that animals live outdoors, in fresh air and direct sunlight, with opportunities to exercise and express natural behaviors – including grazing – while having access to shelter and shade for protection from extreme weather.

Meaningful access to quality pasture is known to improve foot and leg strength, enhance the immune system, allow cows to satisfy their natural behavior patterns, alleviate stress, promote udder health with lower incidence of teat injuries, as well as reduce breeding problems and decrease the risk of lameness and hoof lesions. Studies show milk from grazing animals is higher in omega-3 fatty acids, vitamin E and antioxidants.

Furthermore, below are answers to some questions posed by the National Organic Program (NOP) in the Advanced Notice of Proposed Rulemaking (ANPR) on Pasture:

Scope of the ANPR

(1) Is the current role of pasture in the NOP regulations adequate for dairy livestock under principles of organic livestock management and production?

The current regulation is not adequate. The requirements for access to pasture are being enforced inconsistently by different certification agencies, without correction through the accreditation process. Clarification of the requirements will allow for uniform enforcement and a level playing field for producers. The National Organic Standards Board adopted a set of principles in 2001 that states, “The basis for organic livestock production is the development of a harmonious relationship between land, plants, and livestock, and respect for the physiological and behavioral needs of livestock.” These principles are not met in a system that restricts grazing ruminants to feedlots or supplies insignificant amounts of pasture intake.

(2) If the current role of pasture as it is described in the NOP regulations is not adequate, what factors should be considered to change the role of pasture within the NOP regulations. Provide any available evidence in support of concerns raised.

Animals should live on quality pasture 180 days of every year of their life, rather than have token access to poor pasture.

Access to Pasture

Is there evidence in dairy or animal science literature that supports an appropriate minimum amount of time that dairy cows (or other ruminant animals) should be kept on pasture?

Most organic producers have pasture systems in place that allow them to continue grazing their livestock for a considerable time period after pasture growth has ceased by stockpiling supplemental feed and by having adequate acreage in their systems. One hundred and eighty days should be established as the fewest number of days cows should be on pasture.

On pasture, cows are in their natural environment where they can walk and lay on the earth (rather than concrete), harvest food that provides nutrition, and have access to fresh air, sunlight and freedom to express natural behaviors. Most organic dairy producers have set up their milking systems in such a way that the cows are milked quickly and efficiently and sent out on fresh pasture after each milking. In situations such as these, the cows are grazing, ruminating or resting on pasture for 18 or more hours a day.

Should age and reproductive cycle of the animal be taken into account in determining the minimum amount of time an animal spends on pasture or the amount of feed derived from pasture?

No. It is natural for all ages of ruminants to be on pasture, and many operations do keep all their dairy animals, including calves, on pasture. There should not be an exemption for the process of birthing, since it can take place successfully on pasture. In fact, there should be no exemption from pasture for any other part of the production or reproductive cycles. Only in the event of injury or imminent threat to well-being should confinement take place.

Ruminant Animal Nutrition

What is the appropriate contribution of pasture to ruminant animal nutrition?

It is the normal food source for cattle and should make a major contribution to ruminant nutrition.

Market and Other Impacts

How would a larger role for pasture affect supplies of organic and non-organic milk and milk products? Please provide any evidence or research to support your discussion.


The NOP should ensure the quality and integrity of organic products. Consumer demand will dictate quantity.

Upholding meaningful standards are of utmost importance. Its influence on the supply of organic milk should not be a concern to the NOP. Producers need to comply with the standards. Without clear standards and high integrity within the organic production plan, consumer confidence will be lost and the market will feel the impact much more than any slump due to learning curves or system changes that need to take place.

It is possible that a larger role for pasture could temporarily reduce the availability of the organic milk supply, because industrial “organic” farms will no longer qualify for organic labeling without making substantial alterations to their operations. However, the benefit is that a large portion of consumers has made it clear that they expect grazing on pasture to be a substantial part of organic dairy production. According to a recent Center for Food Safety survey, 50 percent of consumers surveyed said they would no longer buy organic milk if it did not come from cows who graze on pasture for most of their lives. It is far better to keep the confidence of the consumer and let the supply grow at perhaps a slower rate than to compromise consumer trust and expectations, as well as risk hurting long-term market demand.

In addition to the above, NOP regulations should also include parameters for the following indicators of poor management: high cull rates, replacement of year old cows for calves sold to minimize organic feed costs, premature age of cows when sent to slaughter and dual production (simultaneously producing organic and conventional products).

Again, thank you for the opportunity to express our strong support for extensive pasture-based farms as the sole source of organic products. Please contact AWI if you have any questions or seek clarification.

Sincerely,

Research Associate